

D. Craig Parry, Bar No. (UT 7274)  
cparry@parrbrown.com  
**PARR BROWN GEE & LOVELESS**  
101 S 200 E STE 700  
SALT LAKE CITY, UT 84111  
(801) 532-7840

Ali S. Razai (*Pro Hac Vice*)  
ali.razai@morganlewis.com  
Benjamin J. Everton (*Pro Hac Vice*)  
ben.everton@morganlewis.com  
Christian D. Boettcher (*Pro Hac Vice*)  
christian.boettcher@morganlewis.com  
**MORGAN LEWIS BOCKIUS LLP**  
600 Anton Blvd., Suite 1800  
Costa Mesa, CA 92626  
Telephone: (949) 760-0404  
Facsimile: (949) 760-9502

*Attorneys for Plaintiff Hydrafacial LLC*

---

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

---

HYDRAFACIAL LLC, formerly known as  
EDGE SYSTEMS LLC,

Plaintiff,  
v.

LUVO MEDICAL TECHNOLOGIES, INC.,  
CLARION MEDICAL TECHNOLOGIES,  
INC., EUNSUNG GLOBAL CORP., and  
HEALTHCARE MARKETS, INC. doing  
business as POWERED BY MRP,

Defendants.

**PLAINTIFF HYDRAFACIAL LLC'S  
MOTION FOR LEAVE TO FILE UNDER  
SEAL EXHIBITS TO PLAINTIFF'S  
SHORT-FORM MOTION TO COMPEL**

Case No. 2:24-cv-00587-TC-JCB

Judge: Hon. Tena Campbell  
Judge: Hon. Jared C. Bennett

Pursuant to DUCivR 5-3, Plaintiff HydraFacial LLC (“HydraFacial”) respectfully seeks leave to file under seal certain exhibits to its Short-Form Motion to Compel.

“On motion of a party and a showing of good cause, a judge may order that a Document be sealed.” DUCivR 5-3(a)(1). Here, Exhibits 2 and 4 to HydraFacial’s motion should be sealed because they purport to contain information that Defendant Eunsung Global Corp. (“Eunsung”) has designated as Highly Confidential – Attorneys’ Eyes Only pursuant to the protective order entered by this Court on June 26, 2025, ECF No. 73. Pursuant to DUCivR 5-3(b)(2)(C), Eunsung’s designation is the sole reason that Exhibits 2 and 3 to HydraFacial’s motion are being filed under seal. In compliance with DUCivR 5-3(b)(1), HydraFacial hereby attaches an un-redacted copy of the Exhibits 2 and 3.

Accordingly, HydraFacial respectfully requests that the Court grant this motion and keep Exhibits 2 and 3 to HydraFacial’s Short-Form Motion to Compel sealed indefinitely.

Dated: July 17, 2025

Respectfully submitted,

/s/ Benjamin J. Everton

**PARR BROWN GEE & LOVELESS**  
D. Craig Parry

**MORGAN LEWIS BOCKIUS LLP**  
Ali S. Razai  
Benjamin J. Everton  
Christian D. Boettcher

*Attorneys for Plaintiff HydraFacial LLC*

**CERTIFICATE OF SERVICE**

I am a citizen of the United States of America and I am employed in Orange County, California. I am over the age of eighteen years and not a party to the within action. My business address is 600 Anton Boulevard, Suite 1800, Costa Mesa, CA 92626-7653.

On July 17, 2025, I served the foregoing document on counsel shown below via ECF:

Brent O. Hatch (5715)  
Adam M. Pace (14278)  
HATCH LAW GROUP PC  
22 E. 100 S., Suite 400  
Salt Lake City, Utah 84111  
Telephone: (801) 869-1919  
hatch@hatchpc.com  
pace@hatchpc.com

Lauren A. Degnan (pro hac vice)  
Joseph V. Colaianni (pro hac vice)  
Linhong Zhang (pro hac vice)  
April Sunyoung Park (pro hac vice)  
FISH & RICHARDSON P.C.  
1000 Maine Avenue, S.W., Suite 1000  
Washington, D.C. 20024  
degnan@fr.com colaianni@fr.com  
lwzhang@fr.com  
apark@fr.com

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 17, 2025, at Costa Mesa, California.



---

Vanessa Green